

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

INTER-OFFICE CORRESPONDENCE

DATE: October 17, 1978  
MEMO TO: Division File  
FROM: John Taylor  
SUBJECT: TAZEWELL CO./LPC -- #17980101  
PEKIN/MUNICIPAL #1

EPA Region 5 Records Ctr.



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STATE OF ILLINOIS

The closed not finally covered City of Pekin site was inspected on October 17, 1978, by representatives of the Central Region. The site was observed to be in violation of the Solid Waste Rules and Regulations and Pollution Control Board Order No. PCB 75-156, adopted February 11, 1976.

The Pollution Control Board ordered the City of Pekin to "... cease and desist all solid waste disposal activities on said site, and shall close said site in conformity with the Rules and Regulations of this Board, ..." The site clearly has never been closed in conformity with the Rules. Proper final cover has not been applied to the site and the filing requirement outlined in Rule 318(c) has not been met.

Approximately 60 soil borings were made on the subject site on October 17, 1978, by Central Region Personnel. The results revealed that a large part of the filled areas of the site are in need of additional cover. Although exact measurements were not made, it appears that approximately 30,000 to 35,000 cubic yards of additional cover material are needed on this site. It appears that a large part of the site is in need of an additional 1 foot of cover with some areas requiring as much as two full feet. An attached map details the results of the inspection.

A lease agreement between Frank Rosenberg, Inc. and the City of Pekin details the apparent boundaries of the site. It appears that the southern boundary of the site, according to the lease agreement, was over 100 yards north of Manito Road. The field investigation revealed that the site has apparently been filled southward to the northern edge of the Manito Road right of way. A small map submitted in 1974 with a permit application for this site indicates that the site boundary extended southward to Manito Road. If, in fact, this area has been filled as indicated an additional 5,000 to 8,000 cubic yards of cover material will be required to properly close the area.

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Rough computation of the data gathered at the time of the inspection revealed that the site is in need of an additional 32,030 cubic yards of cover material. The southern "extension" of the site apparently needs an additional 5,000 cubic yards of material for proper closure. Some cover material may be available at the northern edge of the site but the boundaries of the site are not clearly defined and little material may be available from this source.

Costs to provide proper final cover for this site are highly speculative at best. At the time of the Enforcement Proceedings, the City of Pekin's engineer testified that the cost of material would be \$3.90 per cubic yard and that grading, leveling and seeding would cost an additional \$2.10 per cubic yard. He also admitted receiving another offer for cover material at \$3.00 per cubic yard. In the Springfield area the highest price paid for earthen material is about \$.75 per cubic yard. Availability of material, haul distances, and availability of equipment are all factors regulating costs of final cover placement. The only way to determine the true cost of covering this site would be through competitive bidding.

For the most part the slopes of the site are gentle and it is felt that little regrading would be necessary. Primarily, all that is needed is placement of adequate final cover and compliance with Rule 318(c). In addition, Part 3 of the Board's Order stated that the "Respondent shall, if determined by the Agency, provide and maintain leachate monitoring sites; and shall report the results of such monitoring to the Agency on a quarterly calender basis." We still have the option of requiring monitor wells at this site.

We should attempt to obtain a Court Order requiring the City of Pekin to properly close and cover the site and perhaps re-affirm our option of requiring groundwater monitoring wells.

JT/cp

cc: Land FOS Manager  
Central Region  
Mary Drake--Enf. Progs.  
Jill Drell--Env. Control Div.